

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 5:01-CR-00012
)	
v.)	
)	
DONALD FELL,)	
)	
Defendant.)	

AGREED MOTION TO CONTINUE STATUS CONFERENCE FOR ONE WEEK

DONALD FELL, defendant in this case, moves through counsel for an Order continuing the status conference presently set for February 19, 2016 for one week to February 26, 2016. The grounds for the motion, set forth in the attached declaration, are that both defense counsel Michael Burt and John Philipsborn are unexpectedly unavailable on February 19, 2016, but are available on February 26, 2016. The government has been contacted and does not oppose the present motion.

WHEREFORE, the defense (with the agreement of the government) moves the Court to continue the status conference presently set for February 19, 2016 for one week to February 26, 2016.

Dated: February 10, 2016

Respectfully Submitted,
MICHAEL N. BURT
KERRY B. DeWOLFE
JOHN T. PHILIPSBORN

By: /s/ Michael N. Burt
Michael N. Burt
Law Office of Michael N. Burt
1000 Brannan Street, Suite 400
San Francisco, CA 94102
(415) 522-1508 phone
(415) 522-1506 fax
mb@michaelburtlaw.com
Counsel for DONALD FELL

CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2016, I electronically filed with the Clerk of Court the following document(s):

AGREED MOTION TO CONTINUE STATUS CONFERENCE FOR ONE WEEK

using the CM/ECF system. The CM/ECF system will provide service of such filing(s) via Notice of Electronic Filing (NEF) to the following NEF parties:

Michael N. Burt, Esq.
Kerry B. DeWolfe, Esq.
William B. Darrow, Esq., Assistant United States Attorney
Bruce R. Hegyi, U.S. Dept. Of Justice

I also caused to be served, by U.S. Postal Service, the following non-NEF party:

Donald Fell
Register Number 05306-010
The Metropolitan Detention Center
P.O. Box 329002
Brooklyn, NY 11232

Dated at San Francisco, California, this 10th day of February, 2016.

/s/ Michael N.Burt
Michael N. Burt
Counsel for Donald Fell